

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 24-CR-00124

LORI BUTTS,
a/k/a LORI BANYARD,

Defendant.

**GOVERNMENT'S UNOPPOSED MOTION FOR ENTRY OF
A PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States of America, by Gregory J. Haanstad, United States Attorney for the Eastern District of Wisconsin, and Carter B. Stewart and Zachary Corey, Assistant United States Attorneys for said district, hereby respectfully moves for the entry of a protective order, and in support thereof states as follows:

1. The indictment in this case charges the defendant with eight counts of health care fraud, pursuant to 18 U.S.C. § 1343, and eight counts of wire fraud, pursuant to 18 U.S.C. § 1343. The indictment alleges, among other things, that the defendant, through her company, owned and operated adult family homes providing service to qualifying adults. Butts, through her company, allegedly billed for hours of care not provided to these residents.

2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect the privacy interests of third parties. This includes personal identifying information of various third parties, such as bank records, bank account information, dates of birth, healthcare information, diagnostic information, information concerning the care of resident's at defendant's company, and personal addresses, among other things.

3. Redacting this information is impracticable. First, the discovery is voluminous and, as the case concerns medical billing, the categories of sensitive information identified above appear in much of the discovery. As a result, attempting to redact this information would be burdensome and would delay the government's ability to provide the discovery to defense counsel. In addition, because the allegations against defendant concern medical billing, redaction of personal identifiers may impede the defense's ability to review and understand the information.

4. Counsel for the government has provided a copy of the proposed protective order to the defendant's counsel, who has indicated that the defendant has no objection to the proposed order governing discovery.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted this 30th day of July, 2024.

GREGORY J. HAANSTAD
United States Attorney

By: *s/Carter B. Stewart*

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